



March 27, 2003

Mr. Richard H. Karney, P.E., Manager
Energy Star Program
Department of Energy
Washington DC 20685

Dear Mr. Karney:

I am President of Hydro Aluminum North America, an integrated producer of extrusion ingot, aluminum extrusion and fabricated products.

We are a 3,000 employee organization with facilities in 12 states, and are committed to responsible development. That commitment is perhaps best illustrated by our development of the capability to produce primary-quality aluminum billet with high (i.e. in excess of 75%) scrap content. In the past 3 years, we have committed over \$80 million in the US in new and upgraded remelt facilities to bring this capability to the market.

I mention this as evidence of our corporate commitment to sustainability and environmentally friendly product solutions. We are in full support of the objectives of the Energy Star program in providing consumers with guidance in the selection of environmentally friendly products.

However, we believe that the proposed Energy Star criteria for windows and doors does the consumer, and the environment, a disservice by only focusing on initial heat gain and thermal conductivity, and in doing so in a highly prescriptive manner. The net result is to preclude the competitive marketing of aluminum based windows and doors in over 95% of the US.

Specifically, the proposed criteria ignores the following:

- Over time, aluminum windows have been proven to be more durable, and to provide more lasting protection against air infiltration than the vinyl products favored by the initial purchase U-factor and SHGC criteria advocated in the proposed standard. I.e.; aluminum has proven itself as a life-cycle energy savings.
- At the end of their useful life, aluminum windows are easily recycled (as our remelt technology demonstrates) with resultant energy savings of 95% vs. new production. We know of no comparable capability with vinyl.

There are several other aspects – e.g. structural integrity -- of aluminum fenestration products that make them an important choice for the consumer.

I would urge the Department to revisit the proposed window and door criteria and to fully consider the concerns brought to the Department by the aluminum fenestration industry. One alternative proposed by the industry – that of a performance based standard rather than prescriptive U-factors and SHGC's – appears to both generate significant energy savings and preserve product choice in the market. We fully support the recommendations and comments of the Aluminum Extruders Council in this area.

Thank you for your attention.

Sincerely,

A handwritten signature in black ink, appearing to read "M. J. Carter", with a long horizontal flourish extending to the right.

Martin J. Carter
President